

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

06DEC2018

Re: 16-239 [Amateur Baud Rate NPRM]

Mr. Chairman –

I am Kevin Wesolowski. KD7DFV, and am an Amateur Extra in Arizona. I am currently an Assistant Emergency Coordinator for Maricopa County. I have been the EmComm Manager for the Arizona Public Service / Palo Verde Generating Station Off-Site response exercises since its inception. In fact, I have been the architect for its creation and its service to & interface with government entities.

We train annually for this purpose and focus on the expanding capabilities of ham radio. We implement and build into our plans the idea of critical communications. We utilize VHF and UHF voice primarily. We are practicing bringing in digital voice and data on those bands as well. If the situation ever develops that necessitates an out of area response, then the use of HF would be also be called upon.

EmComm has changed dramatically in the last 10 years. The need for more options has also changed. When the 300 baud rate rule was implemented, the possibility of modes like Pactor 4, were not even considered possible. The entire concept surrounding the part 97 rules is in regards to bandwidth management and its proper use. I believe the [corrected] language of 2.8 kHz bandwidth instead of 300 baud symbol rate, would reflect acknowledgement of the advancements in the hobby while maintaining its proper use and management.

Additionally, some folks are saying that this mode is some sort of encryption. That is complete and utter nonsense. Just because you can't immediately understand it, like a voice transmission, does NOT make that so! It's no different than DMR, DSTAR, APRS, SDR and all of the other digital modes. A person is free to obtain and implement the use of all of the devices necessary to encode & decode any and all of these transmissions. Plus the fact that a few of the modes I mentioned were also not even thought of just 30 or 40 years ago demonstrates this.

A lot of us here are all for the changing of the verbiage to 2.8 kHz of band width usage. I, of course, can only speak for myself.

Respectfully submitted,

Kevin Wesolowski, KD7DFV
AEC Maricopa County
Palo Verde EmComm Manager